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Attorneys for Defendants Target Corporation,
 International Vitamin Corporation, and
 Perrigo Company of South Carolina, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TODD GREENBERG, On Behalf of
 Himself and All Others Similarly Situated,

Plaintiff,

vs.

TARGET CORPORATION, a Minnesota
 Corporation, INTERNATIONAL
 VITAMIN CORPORATION, a New Jersey
 Corporation, and PERRIGO COMPANY
 OF SOUTH CAROLINA, INC.,

Defendants.

Case No. 3:17-cv-01862-RS

CLASS ACTION

JOINT STIPULATION AND
~~PROPOSED~~ ORDER REGARDING
CLASS CERTIFICATION
SCHEDULE

Complaint Filed: April 4, 2017
 Trial Date: None Set

1 Plaintiff Todd Greenberg (“Plaintiff”) and Defendants Target Corporation
2 (“Target”), International Vitamin Corporation (“IVC”), and Perrigo Company of South
3 Carolina, Inc. (“Perrigo”) (collectively, “Defendants”), by and through their respective
4 counsel submit the following stipulation:

5 WHEREAS Plaintiff’s Second Amended Complaint was deemed filed by Court
6 Order dated April 13, 2018;

7 WHEREAS Target and IVC substituted new counsel on May 4, 2018, which
8 counsel now also represents Perrigo;

9 WHEREAS this Court previously entered an extension of time for Defendants to
10 respond to the Second Amended Complaint, as well as to briefly extend the class
11 certification dates;

12 WHEREAS, based on information provided by Defendants, Plaintiff filed his
13 Corrected Second Amended Complaint on June 22, 2018 for purposes of naming the
14 correct defendant. Defendants filed their respective Answers to Plaintiff’s Corrected
15 Second Amended Complaint on July 5, 2018;

16 WHEREAS due to the extent and scope of written discovery required from the
17 newly added Defendants (IVC/Perrigo), as well as deposition discovery required from all
18 the parties, required to prosecute and defend class certification, as well as scheduling
19 complications associated with such discovery, the Parties hereby jointly stipulate to
20 modify the class certification schedule as follows:

- 21 a. The last day for Plaintiff to file a Motion for Class Certification is extended
22 from September 6, 2018 to December 6, 2018;
- 23 b. The last day for Defendants to file an Opposition to Class Certification is
24 extended from November 15, 2018 to February 14, 2019;
- 25 c. The last day for Plaintiff to file a Reply in Support of Class Certification is
26 extended from January 10, 2019 to April 11, 2019; and
- 27 d. The hearing on Plaintiff’s Motion is continued from January 24, 2019 to
28 May 9, 2019, or another date convenient for this Court.

1 IT IS SO STIPULATED.

2
3 Dated: August 8, 2018

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5 By: /s/ Matthew R. Orr¹
6 Matthew R. Orr

7 Attorneys for Defendants Target Corporation,
8 International Vitamin Corporation, and
9 Perrigo Company of South Carolina, Inc.

10 Dated: August 8, 2018

BONNETT, FAIRBOURN, FRIEDMAN
& BALINT, PC


11
12 By: /s/ Patricia N. Syverson
13 Patricia N. Syverson

14 Attorneys for Plaintiff Todd Greenberg

15
16
17 ~~PROPOSED~~ ORDER

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19
20
21 Date: 8/8/18


22 HON. RICHARD SEEBORG
23 UNITED STATES DISTRICT JUDGE

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27
28 ¹, Matthew R. Orr, hereby attest, pursuant to Northern District of California Civ. L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.